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VIA ECF

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

July 8, 2022

Application GRANTED. Conference adjourned to October 14, 2022 at 11:30 a.m. SO ORDERED.

P. Kevin Castel

United States District Judge

7/8/2022

United States District Judge United States District Court 500 Pearl Street

Hon. P. Kevin Castel

New York, New York 10007

Re: Tongmin Wang v. Cioppa, et al., No. 22 Civ. 3792 (PKC)

Dear Judge Castel:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate three Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from July 13, 2022, to September 12, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for July 29, 2022, be rescheduled for a date during the week of September 26, 2022, or thereafter (with a corresponding extension of time for the preconference submission).

I respectfully request this extension because USCIS is in the process of evaluating the Forms I-730 and needs additional time to consider next steps, which may include a Request for Evidence, Notice of Intent to Deny, or other adjudicatory action. This is the government's first request for an extension of the deadline to respond to the complaint and an adjournment of the pretrial conference. Plaintiff consents to these requests.

¹ Given that a sixty-day extension falls on Sunday, September 11, 2022, the deadline would be extended to Monday, September 12, 2022. *See* Fed. R. Civ. P. 6(a)(1).

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>s/ Jacqueline Roman</u>

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Attorney for Defendants

cc: Counsel of record (via ECF)